

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

MARTHA VASSALLE, et al.

Plaintiffs,

vs.

MIDLAND FUNDING LLC, et al.

Defendants.

Case No. 3:11-cv-0096

Judge David A. Katz

And Related Cases:

Case No. 3:08-CV-1434, N.D. Ohio

Case No. 3:10-cv-0091, N.D. Ohio

**CLASS COUNSEL’S RESPONSE TO OBJECTORS’ JOINT MOTION FOR BRIEFING
SCHEDULE**

There is no need to establish a briefing schedule for the filing of a Motion for Final Approval of the Settlement. The need is to establish a schedule for fully vetting the issues raised by the Objectors. As this Court is aware, there exists a fundamental misapprehension as to the extent of the Release.

The Objectors have filed objections to the settlement that do need to be carefully and thoroughly addressed. It is important for all parties and class members, that sufficient time be allocated to allow for detailed responses.

Class Counsel respectfully suggests that Midland and the Class be given until July 5, 2011 to file one or more responses to the Objectors and propose to file their Motion and Memorandum as to Final Approval and Attorney Fees on or before July 8, 2011. There is no

need otherwise to establish a briefing schedule for the filing of a Final Approval of the Settlement. The need is to establish a schedule to fully discuss the issues of the Objectors, as to the Release.

Respectfully submitted,

/s/Dennis E. Murray, Sr.

Dennis E. Murray, Sr., Esq. (0008783)

dms@murrayandmurray.com

Donna J. Evans, Esq. (0072306)

dae@murrayandmurray.com

MURRAY & MURRAY CO., L.P.A.

111 East Shoreline Drive

Sandusky OH 44870

Telephone: (419) 624-3000

Facsimile: (419) 624-0707

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **Class Counsel's Response to Objectors' Joint Motion for Briefing Schedule** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic system and a copy has been forwarded to the following by electronic mail:

David M. Cullen
Office of the Attorney General
State of Minnesota
david.cullen@state.mn.us
Ste. 1200
445 Minnesota Street
St. Paul, MN 55101

Daniel E. Birkhaeuser
Bramson, Plutzik, Mahler & Birkhaeuser
dbirkhaeuser@bramsonplutzik.com
Ste. 120
2125 Oak Grove Road
Walnut Creek, CA 94598

Charles Delbaum
Stuart Rossman
The National Consumer Law Center
cdelbaum@nclc.org
7 Winthrop Square, 4th Fl.
Boston, MA 02110

Ian D. Chowdhury
Law Offices of Ian Chowdhury
ian@ianchowdhury.com
8853 Fullbright Avenue
Winnetka, CA 91306

Michael D. Kinkley
Scott M. Kinkley
Law Office of Michael D. Kinkley
mkinkley@qwestoffice.net
Ste. 914
4407 North Division Street
Spokane, WA 99207

A copy of the forgoing has also been forwarded by ordinary mail to the following:

Anamaria Segura
Carolyn E. Coffey
MYF Legal Services
4th Floor
299 Broadway
New York, NY 10007

Karuna B. Patel
Center for Responsible Lending
Ste. 500
910 17th Street, NW
Washington, DC 20006

Tashi T. Lhewa
Legal Aid Society of New York
120-46 Queens Blvd.
Kews Garden, NY 11415

On this 14th day of June, 2011.

/s/Dennis E. Murray, Sr.

Dennis E. Murray, Sr., Esq. (0008783)

Donna J. Evans, Esq. (0072306)

Attorneys for Plaintiffs